



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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86 Chambers Street  
New York, NY 10007

August 29, 2024

**BY ECF**

The Honorable Dale E. Ho  
United States District Court  
40 Foley Square  
New York, NY 10007

Re: *Knight First Amendment Institute at Columbia Univ. v. U.S. Dep't of State et al.*,  
22 Civ. 3003 (DEH)

Dear Judge Ho:

This Office represents defendants the U.S. Department of State (“State”), the U.S. Department of Homeland Security (“DHS”), and the Office of the Director of National Intelligence (“ODNI”; collectively with State and DHS, “Defendants” or the “Agencies”) in the above-referenced case brought by plaintiff Knight First Amendment Institute at Columbia University (“Plaintiff”) pursuant to the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552. I write respectfully on behalf of both parties to provide a status update pursuant to the Court’s order dated July 30, 2024, Dkt. No. 51.

As noted in the parties’ recent joint status reports, Dkt. Nos. 48, 50, the parties are engaged in discussions to attempt to potentially narrow or resolve disputed issues. Plaintiff has requested additional information from the Agencies concerning certain of Defendants’ withholdings from the records produced in response to Plaintiff’s FOIA request. Since the last status report, the parties have continued their discussions regarding questions related to DHS and ODNI documents; and State is continuing to prepare its response to the issues raised by Plaintiff.

The parties respectfully propose to provide another status update by September 30, 2024. This will provide an opportunity for the parties to continue their discussions to resolve or narrow the issues in dispute. If, by September 30, the parties have determined that disputed issues remain that they cannot resolve themselves, the parties plan to confer regarding a proposed briefing schedule on cross-motions for summary judgment.

We thank the Court for its consideration.

Respectfully,

DAMIAN WILLIAMS  
United States Attorney

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cc: Counsel of record (via ECF)